

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES
OFFICE OF THE CONSUMER ADVOCATE

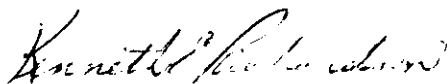
Postal Rate and Fee Changes, 1997)

Docket No. R97-1

ANSWERS OF THE OFFICE OF THE CONSUMER ADVOCATE
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE
WITNESS: PAMELA A. THOMPSON (USPS/OCA-T100-1-10)
(JANUARY 22, 1998)

The Office of the Consumer Advocate hereby submits the answers of Pamela A. Thompson to interrogatories USPS/OCA-T100-1-10, dated January 8, 1998. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



KENNETH E. RICHARDSON
Attorney
Office of the Consumer Advocate

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TO INTERROGATORIES USPS/OCA-T100-1-10

USPS/OCA-T100-1. Please refer to OCA-LR-6, footnote 1 on page 3 and the third line on page 24. Do the terms "my results" on page 3 and "I put" on page 24 refer to you?

A. Yes.

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USPS/OCA-T100-2. Please specify all the computer software and hardware requirements used in programming, executing and producing OCA's version of the Commission's cost model. The description should include names, version numbers and any modifications of software or hardware.

A. In Docket No. MC96-3, the Commission filed a copy of its cost model in PRC-LR-

5. The OCA's cost model is a copy of the Commission's Docket No. MC96-3 cost model. In this docket, two modifications to the Commission's cost model were made.

One modification is discussed in OCA's library reference OCA-LR-4 at 5-6. The second modification involves a change to the program PRMAT.C. The Commission's cost model mislabeled segment 6 data as segment 5 data. To correct the labels, the following code in PRMAT.C was changed from "segi = (kt < 5) ? kt+1 : kt+2;" to "segi = (kt < 4) ? kt + 1 : kt +2;". Changing the "5" to "4" corrected the segment label. The updated cost model programs were recompiled using a DOS version of Borland's 2.01 Turbo C. No other modifications were made to the code.

I do not know what minimum system requirements are needed to operate the files provided in OCA's library reference OCA-LR-4, 6 and 7. The office computer I use has the following hardware configuration: Pentium 166 processor, 80 megs of RAM, 2.0 gigabyte hard drive, 3.5 floppy drive, CD ROM drive (speed unknown, but not used during this docket) and an external ZIP drive.

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USPS/OCA-T100-3. Please refer to the description of updating the COMP.TXT file on pages 7-12, Section III.A of OCA-LR-4.

(a) Please confirm that the referenced PRCCOMP.XLS file is from Docket No. MC96-3, PRC-LR-5, Part 1, on pages 1-12 of the section entitled "Component Titles".

(b) Please confirm that on page 3 of Docket No. MC96-3 PRC-LR-5, Part 1, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
9	Special Delivery Messengers- Salaries - Office	901	58

(c) Please confirm that on page 11 of Docket No. MC96-3 PRC-LR-5, Part I, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
21	Reserved for Special Delivery Salaries Key	2159	58

(d) Please confirm that on page 3 of Docket No. R97-1 OCA-LR-6, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
9	Special Delivery Messengers- Salaries - Office	901	58

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(e) Please confirm that on page 11 of Docket No. R97-1, OCA-LR-6, the following information is shown:

Cost Segment	Title	PRC Component Number	USPS Component Number
21		2159	61

(f) Please refer to the comment on page 9 of OCA-LR-4: "[a]n additional source of Postal Service component numbers is USPS library reference H-4 at 221-250". Confirm that on page 228 of USPS LR-H-4, component 58 is defined as "Special Delivery Messengers, Salaries, Office" and component 61 is defined as "Special Delivery Messengers, Total Salaries."

(g) In light of the explanation on pages 8-9 of OCA-LR-4 that USPS component 58 is associated with both Commission components 901 and 2159, please explain your understanding of USPS components 58 and 61, and of Commission components 901 and 2159. Include in your explanation your definition of each of the components, and the volume variable and accrued dollar amounts for each component as shown in the Manual Input Requirement for both the Postal Service's and the OCA's cost models.

A. (a) The file I am referring to in Section III of OCA-LR-4, pages 7-12, is the Excel file, PRCCOMP.XLS. A copy of PRCCOMP.XLS is provided on the diskette accompanying the Docket No. MC96-3 library reference PRC-LR-5.

(b) Confirmed.

(c) Confirmed.

(d) I assume you are referring to Docket No. R97-1, OCA-LR-6, tab OCACOMP.XLS, page 3 of 12. If so, then confirmed.

(e) I assume you are referring to Docket No. R97-1, OCA-LR-6, tab OCACOMP.XLS, page 11 of 12. If so, then confirmed.

(f) Not confirmed. "Special Delivery Messengers, Salaries, Office" does not appear in USPS library reference H-4 at 228. "Special Delivery Messengers, Salaries

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Office", component 58, appears in USPS library reference H-4 at 223. "Special Delivery Messengers, Total Salaries", component 61, appears in USPS library reference H-4 at 223.

(g) In Docket No. MC96-3, Postal Service component 58 was associated with PRC components 901 and 2159. OCA-LR-4 at 8-9 provides an example of what a duplicate entry in COMP.TXT would look like given the information used in Docket No. MC96-3. The example I provided appears to have caused some confusion.

Segment 21 is used in the Commission's cost model to store distribution keys and Postal Service volumes. The PRC's cost model is limited to a maximum of 99 components for each segment. In segment 21, the component numbers range from 2101 to 2199. Due to the component numbering limitation, numbers in segment 21 could vary from one docket to another. I tried to maintain the PRC's numbering scheme as much as possible, however, I did make some changes. One change I made, in Docket No. R97-1, was to PRC component 2159. This change is noted on OCA's Updated Cost Roll-Forward Model Component Titles and Numbers list – OCA-LR-6, tab OCACOMP.XLS at 11. The diskette accompanying OCA-LR-4 contains the file, COMP97.TXT. OCA-LR-4 at 8-12 discusses the COMP.TXT file. When I wrote pages 8-12, I provided a generic file name, COMP.TXT. When I provided copies of the files I used, I renamed the physical file COMP.TXT to COMP97.TXT. The renaming was done to help me distinguish COMP.TXT files from one docket to another. In Docket No.

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R97-1, COMP97.TXT shows that PRC component 2159 is associated with Postal Service component 61.

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USPS/OCA-T100-4. Please refer to pages 10-12 of OCA-LR-6. There are numerous PRC Component Numbers for which the associated USPS Component Number contains the phrase "see also." These PRC components are: 2110, 2115- 2126, 2144, 2146-2147, 2151 and 2170-2173.

(a) For each of these PRC components, please explain to what documentation the "see also" refers. For example, are both USPS Component Numbers 364 and 96 associated with PRC Component Number 2144, and where is this documented?

(b) Please provide the correct USPS Component Number and cite the USPS documentation that provides the source of the information. For example, is USPS-LR-4 the source of the component numbers and definitions?

(c) If USPS-LR-4 is the source, please provide the page numbers on which the information can be found.

(d) Please provide any revised pages to OCA-LR-6 that may result.

A. (a) - (d) Pages 10-12 of OCA-LR-6 do not contain the phrase "see also". If you are referring to OCA-LR-6, tab OCACOMP.XLS, pages 10-12, please see the revisions to OCA-LR-6 filed on January 13, 1997. I believe these corrections (which consist of an accurate printout of pages 10 and 11) should clear up any misunderstanding about the citation of Postal Service component numbers.

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USPS/OCA-T100-5. Please refer to pages 10-12 of OCA-LR-6. There are numerous PRC Component Numbers for which there is no associated USPS Component Number.

(a) Please provide the associated USPS Component Numbers and cite the documentation from which this information is taken.

(b) If there are any USPS Component Numbers that are not available for PRC Component Numbers, please explain why they are not required to execute the Commission's cost model.

A. (a) Cost Segment 21:

<u>PRC Component No.</u>	<u>USPS Component No.</u>
2153	Defined in PESSA96P.FAC as "xs,2153,4,901,902,903,904". PRC component 2153 is the sum ("xs") of PRC components 901, 902, 903 and 904.
2163	547. See OCA-LR-4, filename COMP97.
2169	Defined in PESSA96P.FAC as "xs, 2169,3, 601,602,604".
2174	Not used in the Base Year. Used in FY 97 to distribute costs to STD B Parcels – USPS component 1418. See USPS-T-15, Appendix A at 9. See also OCA-LR-6 at 20-21 and USPS-T-5, Workpaper A at 131-132.
2175	Not used in the Base Year. The component is used in FY 97 and is defined in PESSA97P.FAC as "xs,2175,3,2154,-2304,-2309".
2176	Not used in the Base Year. The component is used in FY 97 and is defined in PESSA97P.FAC as "xs,2176,6,2155,-2301,-2302, , -2303,-2304,-2309".
2177	For the Base Year, component 2177 is defined in PESSA96P.FAC as "xs,2177, 21,601,602,603,604,701,702,703, 704,705,706,707,708,709,710,711,712,713,901,902,1001, 1002". In replicating FY 97 data, 2177 is reused as the International Mail distribution key – USPS component 1419. See

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USPS-T-15, Appendix A at 9. See also OCA-LR-6 at 20-21 and USPS-T-5, Workpaper A at 131-132.

- 2178 The command creating the data is found in HLSDIST.FAC. The instructions are
“xs,2178,67,201,202,221,222,204,205,206,207,208,
209,211,212,216,217,218, 210,305,705,711,703,709,
1207,223,224,225,301,302,304,310,309,312,313,
314,315,316,317,308,306,401,601,604,602,
701,702,704,706,707,708,710,712, 713,801,901,
902,1001,1002,1102,1206,1209,1210,1201,1202,1203,1204,1205,
1208,1211”.
- 2179 Not used in the Base Year. In FY 97, component 2179 contains Postal Service FY 97 volumes. See OCA-LR-6, tab FY97LP.LR, PRC component 2102. In FY 98, component 2179 contains Postal Service FY 98 volumes. See OCA-LR-7, tab FY98LP.LR, PRC component 2104.
- 2180 907. See OCA-LR-4, filename COMP97.
- 2181 914. See OCA-LR-4, filename COMP97.
- 2182 915. See OCA-LR-4, filename COMP97.
- 2183 917. See OCA-LR-4, filename COMP97.
- 2184 918. See OCA-LR-4, filename COMP97.
- 2185 919. See OCA-LR-4, filename COMP97.
- 2186 921. See OCA-LR-4, filename COMP97.
- 2187 923. See OCA-LR-4, filename COMP97.
- 2188 931. See OCA-LR-4, filename COMP97.
- 2189 924. See OCA-LR-4, filename COMP97.
- 2190 971. See OCA-LR-4, filename COMP97.
- 2191 913. See OCA-LR-4, filename COMP97.

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2199 None identified

(b) I do not know if USPS component numbers exist for all PRC components.

That question is outside the scope of my testimony.

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USPS/OCA-T100-6. Please refer to page 9 of OCA-LR-4 and the sentence that reads "[t]he Postal Service's Base Year data file, B.DAT, (USPS library reference H-6, subdirectory \Ps420d01\Fy96mods) reflects the Postal Service's MIR with adjustments and indirect cost distributions". Also, refer to the response of Witness Patelunas, USPS-T5 to OCA interrogatory OCA/USPS-T5-5a that states "[t]he I.DAT data file provided on CD ROM in Postal Service Library Reference H-6, subdirectory "ps410d01/fy96mods" is the same file as USPS-T-5, Workpaper A-1, Manual Input Requirement."

(a) Please provide a complete explanation as to why you decided to use the B.DAT file rather than the I.DAT file for your version of the Postal Service's Manual Input Requirement.

(b) If the I.DAT file had been used, would you have needed the SAS conversion provided in OCA-LR-3?

A. (a) - (b) The first decision I faced when I began the process of replicating the Postal Service's cost data with the updated version of the Commission's cost model was what Postal Service data file to use. I was aware of both the B.DAT and I.DAT files to which your interrogatory refers. However, I did not know what the difference was between the two files. The SAS conversion file provided in OCA-LR-3 was used on both files. Both files appeared to require editing in order to replicate the Manual Input Requirement found in USPS-T-5, Workpaper A. I chose to use the B.DAT file from USPS library reference H-6, subdirectory Ps420d01/FY96mods. Due to the magnitude of the task required to document and replicate the Postal Service's cost data and the time constraint I was operating under, I made the decision to use the Postal Service's B.DAT file prior to receiving the Postal Service's response to OCA/USPS-T5-5a.

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USPS/OCA-T100-7. Please refer to the description on pages 11-14 of OCA-LR-4 of how PRCCOMP.XLS updates the Postal Service's B.DAT file to reflect the Postal Service's Manual Input Requirement.

(a) In Subpart b, it states that when a Postal Service component is deleted, "the Commission's component number in the PRCCOMP.XLS listing is retained for future use." Then, an example is given in which the Postal Service's component 6001 is deleted and the Commission's component 213 is retained for future use. Please confirm that when the Commission's component 213 is reused, it may be associated with any USPS component. If confirmed, please explain how the Commission's model avoids confusing the old USPS component number (6001) and the new USPS component number (other than 6001). If not confirmed, please explain the correct interpretation of the comment "retained for future use."

(b) Referring to Subpart c, please confirm that if component XX00, in segment XX, is moved to segment YY, it is renamed in the Commission's model to component number YY00. If confirmed, please describe in detail all of the modifications that would need to be made to the Commission's model to incorporate this change. If not confirmed, what would the renamed component number be and what modifications would need to be made to the Commission's model to incorporate this change?

(c) In the description provided in Subpart d, there is a discussion of Commission component 301 and USPS components 35 and 546. It states "[w]hen the COMP.TXT file is built, the information in the file matches the Commission's component 301 with the Postal Service's component 546 so that the data in BASEYEAR.BIN segment 3 component 301 (3:1) corresponds to the Postal Service's MIR. USPS-T-5, Workpaper A-1 at 15-16.1." Referring to pages 15-16.1 of USPS-T-5, Workpaper A-1, it lists both components 35 and 546. Please explain your understanding of the USPS components 35 and 546 and cite the documentation that provides this information. Include in your explanation whether or not USPS components 35 and 546 are identical in the I.DAT and B.DAT files provided in USPS-LR-6.

(d) Please refer to footnote 6 on page 14 which states "[t]he third row contains 5 data numbers followed by the component identifier." Then an example is given for component 2192 and the explanation is "[t]he third row contains 4 '0's followed by the component identifier." Which is the correct description of the components being converted in BASEYEAR. DAT?

A. (a) Confirmed. I do not know what steps the Commission would take to avoid potential confusion. However, documentation would be one possibility.

(b) Your example appears correct, however, I would like to clarify my understanding of your interrogatory. The Commission's cost model works within a

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segment/component numbering scheme that is XX01 to XX99. There is no XX00. In your example, if component XX00 is moved to segment YY then the new component number for XX00 would only be YY00 if there was not a pre-existing component numbered YY00. I have not encountered a situation of this type, so I cannot say what further steps would be required. However, my general understanding of the necessary considerations involved to incorporate a change would depend on what component is moved, what pre-existing relationships existed, and whether it is necessary to maintain such pre-existing relationships.

(c) The extraction of information for Commission component 301 was performed by a former OCA staff member, who now works for the Postal Service. Prior to his departure, he wrote a SAS program, PREPROC.SAS, that extracted specific data from the Postal Service's data files. PREPROC.SAS is provided in this docket as OCA-LR-3. The data file extract his SAS program produced contained Postal Service data in a format compatible with the Commission's cost model. PRC component 301 was set to pull data from Postal Service component 546. I personally verified that PRC component 301 matched USPS component "35 & 546" in USPS-T-5, Workpaper A at 15-16.1. Therefore, I was satisfied that the data extraction had been performed correctly. I am unable to answer whether USPS components 35 and 546 are identical in the I.DAT and B.DAT files provided in USPS-LR-6. I do not know how to locate USPS component 35 in the Postal Service's I.DAT and B.DAT file.

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(d) OCA-LR-6, page 14, footnote 6 should refer to component "2199" not "2192".

Please see the revisions to OCA-LR-6, filed January 13, 1998.

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USPS/OCA-T100-8. Please refer to OCA-LR-4, page 15, Part IV that states "[p]rior to executing any of the four cost model programs, XREAD, COSTMOD, LRCOST, and PRMAT, the test files TITLES and ROWCOL.H are reviewed and updated as required." Was this review and update of the test files performed during the process of producing OCA-LR-4? If the response is affirmative, please provide a step-by-step description of how the review and update was accomplished, including a list of the time involved with each step. If the response is anything other than affirmative, please explain why it was not necessary to perform this review and update of the test files.

A. Please note that you incorrectly quoted me. I did not use the term "test files;" the library reference says "text files". OCA-LR-4 was written after I replicated the Postal Service's Base Year cost data. In this docket, I visually compared the contents of the TITLES file used to replicate the Base Year data with the headers appearing in USPS-T-5, Workpaper A, Manual Input Requirement. Another source for the Postal Service's headers is USPS library reference H-4, member name AHEAD at 45-46. Changes to the text file TITLES were typed into the file using Windows 95 Notepad.

For FY 97, I visually compared the contents of TITLES with USPS-T-15, WP A. Changes to the text file TITLES were typed into the file using Windows 95 Notepad. For FY 98, I visually compared the contents of TITLES with USPS-T-15, WP F. I did not need to make changes in the text file TITLES for FY 98. I did not keep a record of the time I spent comparing Postal Service headers with those appearing in the text file TITLES.

After updating TITLES to accommodate the Postal Service's elimination of the distinction between Postal Cards and Private Postcards, I knew that ROWCOL.H needed to be edited as described in OCA-LR-6 at 17. I did not keep a record of the

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time I spent typing in the change to ROWCOL.H.

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USPS/OCA-T100-9. Please refer to pages 19-20 of OCA-LR-4.

(a) The first full paragraph on page 19 states "If the total number of components in the first 23 segments of the Commission's cost model program changes, then the change must be reflected in the appropriate number in the line "ins sc[24]=(3,...44)." Did the "total number of components" change so as to require an update to the program to produce OCA-LR-4? If the response is affirmative, please describe the edit process and provide an estimate of the time required. If the response is anything other than affirmative, please provide an estimate of the time required to make the determination that no change was required.

(b) The second full paragraph states "[g]enerally, segment 21 is used to store the results of calculations that become distribution keys; segment 22 acts as temporary working storage; segment 23 stores PESSA cost totals; and segment 24 stores the sum of segments 1 through 20? If these segments are "generally" used as described, please provide a complete list of any exceptions to the rule and provide a complete explanation of why each exception was necessary.

(c) The last line on page 18 and continuing onto page 19 states "In both segments 21 and 22, the maximum number of components available is 99 and which is currently an internal program memory limitation." Has this "memory limitation" caused any programming or execution problems with the Commission's model? If the response is affirmative, please explain in detail how the problems were solved and provide an estimate of how much time was expended solving these problems. If the response is anything other than affirmative, was the statement made solely to indicate the possibility of a problem?

(d) Referring to the discussion in part c, has there been any study to determine whether or not the "memory limitation" will cause any programming or execution problems in the future? If the response is affirmative, please provide all analyses, documentation and an estimate of the amount of time spent studying this issue. If the response is anything other than affirmative, please provide an explanation of why this issue has not been considered.

A. (a) The cite provided in the interrogatory is incorrect. I believe the sentence you are referring to is the third sentence of the first full paragraph on page 18. As stated in OCA-LR-4 at 20, no changes were required. I ran the cost model and verified that the data replicated USPS-T-5, Workpaper A, Manual Input Requirement. Therefore, I knew no further changes were required to ROWCOL.H. If the Postal Service had added additional components, I would have had to find where the Postal Service had added

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components and adjust ROWCOL.H accordingly. I have not encountered this problem, therefore, I have no basis upon which to base an estimate.

(b) The term "generally" was used because segment 21 not only stores results of calculations, it also stores Postal Service volumes. Segment 24 stores the sum of segments 1 through 20 and the column titled "TOT:23" is the sum of segment 22. Segment 24 also includes volumes and the column "Cost/Pc." I am not aware of any other exceptions.

(c) I experienced a memory limitation with the updated version of the Commission's cost model. To solve the limitation, I isolated each year's data in a separate subdirectory. Please refer to the introduction in OCA-LR-6, second paragraph. I did not keep a record of the time spent solving this problem.

(d) I did not perform any analysis as this was outside the scope of my testimony.

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USPS/OCA-T100-10. Please refer to the list of components on page 24 of OCA-LR-4 that require manual editing.

(a) Please confirm that the differences range from \$50(000) for Commission component 1807 to \$520,441 (000) for Commission component 1810.

(b) For each of these components, please explain in detail the reason(s) for the differences.

(c) Was an analysis performed at the time OCA-LR-4 was being produced to understand the causes of these differences. If the response is affirmative, please provide copies and documentation of all tests performed, all hypothesis tested and an estimate of the amount of time expended for each of the stages of the analysis. If the response is anything other than affirmative, please explain in detail the reasons why it was decided that these differences were not of such significance so as to warrant further study.

(d) Please list any other differences between BASEYEAR.DAT and the USPS Manual Input Requirement found at this stage, whether due to rounding or any other reason, and explain how these differences were resolved. Please provide documentation for the analysis completed, the results and an estimate of the time expended on this effort.

A. (a) Confirmed.

(b) & (c) A former OCA staff member prepared the Postal Service data file extract I used. See my response to USPS/OCA-T100-7(c). I do not know why the differences exist. I do not know what analyses he may have performed. I did attempt to find an explanation for some differences I found. Please see the response of USPS witness Patelunas to OCA/USPS-T5-3. Analyzing the differences was outside the scope of my testimony. I accepted the Postal Services numbers as provided in USPS-T-5, Workpaper A, Manual Input Requirement and edited the OCA's data file to agree with the Postal Service's Manual Input data. I did not keep a record of the time spent, therefore I cannot provide an estimate.

(d) I do not know of any other differences. I did not keep a record of the time spent, therefore I cannot provide an estimate.

DECLARATION

I, Pamela A. Thompson, declare under penalty of perjury that the answers to interrogatories USPS/OCA-T100-1-10 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed January 27, 1998

Pamela A. Thompson

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


KENNETH E. RICHARDSON
Attorney

Washington, DC 20268-0001
January 22, 1998